

Summary by Activity		
Motion to Compel	Hours Billed	Fees
Conference Efforts in Preparation for Motion to Compel	19	\$ 12,234.00
Preparing Motion to Compel	38.9	\$ 21,670.50
Replying to Response to Motion to Compel	23.9	\$ 13,854.50
Replying to Amended Response to Motion to Compel	48.3	\$ 28,186.50
Responding to Motion for Leave to File Surreply	12.7	\$ 7,206.50
Additional Conference and Other Efforts Related to Motion to Compel	19	\$ 12,418.00
Preparing for and Attending Hearing on Motion to Compel	17.8	\$ 10,260.00
Responding to Emergency Motion to Amend Compel Order	16.4	\$ 10,165.00
Subtotal	196	\$ 115,995.00
Motion for Sanctions	Hours Billed	Fees
Preparing Advisories and Related Conference Efforts	65.4	\$ 39,283.50
Preparing Motion for Sanctions	45	\$ 26,650.00
Conference and Other Efforts Related to Motion for Sanctions	6.8	\$ 4,631.00
Replying to Response to Motion for Sanctions	36.7	\$ 22,030.50
Preparing for and Attending Evidentiary Hearing on Motion for Sanctions	169.5	\$ 97,823.00
Subtotal	323.4	\$ 190,418.00
Forensic Work	Hours Billed	Fees
Forensic Related Attorney Work	11.6	\$ 7,789.00
Subtotal	11.6	\$ 7,789.00
Attorneys' Fees Total	531	\$ 314,202.00
Forensic Costs	Hours Billed	Fees
R3 Digital Forensics Invoices	74	\$ 23,810.00
Forensic Costs Total	74	\$ 23,810.00
Grand Total	605	\$ 338,012.00

Summary of Attorneys' Fees by Time Keeper				
Time Keeper	Title	Rate	Hours Billed	Fee
Adam H. Sencenbaugh	Partner	\$ 725.00	192.8	\$ 139,780.00
Iris Gibson	Counsel	\$ 700.00	38.1	\$ 26,670.00
Henson Adams	Associate	\$ 495.00	276.7	\$ 136,966.50
Chrissy Long	Associate	\$ 495.00	17.9	\$ 8,860.50
Mike Brockwell	Trial Services Consultant	\$ 350.00	5.5	\$ 1,925.00
Grand Total			531	\$ 314,202.00

Motion to Compel: Conference Efforts in Preparation for Motion to Compel						
DATE	TIME KEEPER	DESCRIPTION	TIME	RATE	FEE	ACTIVITY
11/27/2019	Adam H Sencenbaugh	Telephone conference with client representatives regarding Defendants' response to discovery requests; begin draft of correspondence to opposing counsel regarding deficiencies in document production and discovery responses; email correspondence with client representatives regarding case status.	3.4	\$725.00	\$2,465.00	C.1
11/29/2019	Adam H Sencenbaugh	Analyze discovery responses from opposing counsel to draft correspondence regarding discovery deficiencies; outline legal issues relevant to discovery dispute and motion to compel.	2.8	\$725.00	\$2,030.00	C.1
11/30/2019	Henson Adams	Draft and revise discovery deficiency letter to opposing counsel; review discovery responses regarding the same; research federal law regarding general objections. [REDUCED BY 3.0 HOURS]	3.3	\$495.00	\$1,633.50	C.1
11/30/2019	Adam H Sencenbaugh	Revise correspondence to opposing counsel regarding discovery deficiencies and Motion to Compel; analyze legal issues relevant to discovery dispute and Motion to Compel.	3	\$725.00	\$2,175.00	C.1

12/3/2019	Henson Adams	Continue to draft and revise letter to opposing counsel regarding discovery deficiencies; review client comments to the same; review and analyze Defendants' Discovery Responses with respect to deficiencies and objections. [REDUCED BY 3.0 HOURS]	1.2	\$495.00	\$ 594.00	C.1
12/3/2019	Adam H. Sencenbaugh	Email correspondence with client representatives regarding case status; revise correspondence to opposing counsel regarding discovery deficiencies.	1.3	\$725.00	\$ 942.50	C.1
12/4/2019	Henson Adams	Revise and finalize Discovery Deficiency Letter; review and analyze discovery responses regarding the same.	2.2	\$495.00	\$ 1,089.00	C.1
12/4/2019	Adam H. Sencenbaugh	Revise and transmit correspondence to opposing counsel regarding failure to respond to outstanding discovery requests.	1.8	\$725.00	\$ 1,305.00	C.1
Subtotal			19		\$ 12,234.00	

Motion to Compel: Preparing Motion to Compel						
DATE	TIME KEEPER	DESCRIPTION	TIME	RATE	FEE	ACTIVITY
12/5/2019	Henson Adams	Correspondence with client regarding Discovery Deficiency Letter; begin draft of Motion to Compel regarding discovery deficiencies by Defendants; research and analyze Federal Rules of Civil Procedure on Motions to Compel discovery and federal case law regarding the same.	4.9	\$495.00	\$ 2,425.50	C.2
12/9/2019	Henson Adams	Telephone call with forensic examiner to discuss the protocol for collecting electronic devices and to discuss past forensic findings and analysis for use in Motion to Compel; continue to draft Motion to Compel; analyze case documents, past correspondence with opposing counsel, and forensic reports with respect to preparation of Motion to Compel.	6.4	\$495.00	\$ 3,168.00	C.2
12/10/2019	Henson Adams	Prepare template for appendix to Motion to Compel.	0.4	\$495.00	\$ 198.00	C.2
12/11/2019	Henson Adams	Continue to draft Motion to Compel; analyze electronic data, past correspondence with opposing counsel, and forensic reports with respect to preparation of Motion to Compel; prepare exhibits and supporting documents for Motion to Compel, including drafting and revising declarations.	6.6	\$495.00	\$ 3,267.00	C.2

12/12/2019	Henson Adams	Continue to draft and revise Motion to Compel; prepare additional exhibits for Motion to Compel.	2.5	\$495.00	\$ 1,237.50	C.2
12/13/2019	Henson Adams	Continue to draft and revise Motion to Compel.	0.4	\$495.00	\$ 198.00	C.2
12/15/2019	Henson Adams	Draft and revise declaration of Tim Lavin and Adam Sencenbaugh in support of Motion to Compel; draft proposed order granting Motion to Compel; revise Motion to Compel and continue to gather and prepare exhibits regarding the same. [REDUCED BY 2.0 HOURS]	2.9	\$495.00	\$ 1,435.50	C.2
12/15/2019	Adam H. Sencenbaugh	Revise Motion to Compel documents and interrogatory responses from Defendants; revise Declaration of Tim Lavin in support of Motion to Compel; revise Appendix of arguments in support of Motion to Compel.	4.6	\$725.00	\$ 3,335.00	C.2
12/16/2019	Henson Adams	Revise and finalize Motion to Compel; gather, prepare, and finalize exhibits to the same, including Declarations of Tim Lavin and Adam Sencenbaugh, exhibits, past correspondence with opposing counsel, forensics reports, and proposed order; discuss Motion to Compel and exhibits with client; strategize regarding presentation of Motion to Compel issues, including timeline of events, in the hearing with the Court. [REDUCED BY 2.0 HOURS]	4.3	\$495.00	\$ 2,128.50	C.2
12/16/2019	Iris Gibson	Review and revise Lavin Declaration in Support of Motion to Compel.	[0.9]	N/A	No Charge	C.2

		Revise Motion to Compel discovery responses; revise Declaration of Tim Lavin in Support of Motion to Compel; revise Declaration of Adam Sencenbaugh in Support of Motion to Compel; revise Proposed Order in Support of Motion to Compel; email correspondence with client representatives regarding Motion to Compel.				
12/16/2019	Adam H. Sencenbaugh		5.9	\$725.00	\$ 4,277.50	C.2
Subtotal			38.9		\$ 21,670.50	

Motion to Compel: Replying to Response to Motion to Compel						
DATE	TIME KEEPER	DESCRIPTION	TIME	RATE	FEE	ACTIVITY
12/17/2019	Henson Adams	Begin to prepare reply briefing on Motion to Compel; research federal law regarding sanctions.	1.8	\$495.00	\$ 891.00	C.3
12/23/2019	Henson Adams	Review and analyze Defendants' Response to Motion to Compel, including reading and analyzing case law cited in the same; continue to draft and revise BalanceCXI's Reply to the same.	3	\$495.00	\$ 1,485.00	C.3
12/23/2019	Adam H. Sencenbaugh	Analyze Response to Motion to Compel filed by opposing party in case; email correspondence and telephone conference with client representatives regarding Response to Motion to Compel and case strategy.	1.9	\$725.00	\$ 1,377.50	C.3
12/24/2019	Henson Adams	Continue to review and analyze Defendants' Response to Motion to Compel; continue to draft and revise BalanceCXI's Reply to the same.	1.2	\$495.00	\$ 594.00	C.3
12/26/2019	Henson Adams	Continue to review and analyze Defendants' Response to Motion to Compel; continue to draft and revise BalanceCXI's Reply to the same; gather and prepare exhibits, including declaration of Henson Adams, to support the reply.	3.6	\$495.00	\$ 1,782.00	C.3

12/26/2019	Adam H. Sencenbaugh	Revise Reply in Support of Motion to Compel production of documents and interrogatory responses; email correspondence with client representatives regarding Reply in Support of Motion to Compel.	3.8	\$725.00	\$ 2,755.00	C.3
12/27/2019	Henson Adams	Revise and finalize draft of reply to send to client for review.	1.1	\$495.00	\$ 544.50	C.3
12/27/2019	Adam H. Sencenbaugh	Revise declarations and exhibits in support of Reply for Motion to Compel production of documents and interrogatory responses.	0.8	\$725.00	\$ 580.00	C.3
12/30/2019	Henson Adams	Revise and finalize BalanceCXI's Reply to Defendants' Response to BalanceCXI's Motion to Compel; finalize and marshal exhibits to the same; finalize Declaration of Henson Adams in support of Reply; correspondence with opposing counsel to send courtesy copy of filed Reply.	4.4	\$495.00	\$ 2,178.00	C.3
12/30/2019	Adam H. Sencenbaugh	Revise and file Reply in Support of Motion to Compel production of documents and interrogatory responses.	2.3	\$725.00	\$ 1,667.50	C.3
Subtotal			23.9		\$ 13,854.50	

Motion to Compel: Replying to Amended Response to Motion to Compel						
DATE	TIME KEEPER	DESCRIPTION	TIME	RATE	FEE	ACTIVITY
1/22/2020	Henson Adams	Review Defendants' Motion to Seal, Motion for Leave to Amend Response to Motion to Compel, Motion to Exceed Page Limits, and corresponding exhibits, including the Declaration of Mr. O'Brien; discuss and strategize the same with client.	1.3	\$495.00	\$ 643.50	C.4
1/22/2020	Adam H. Sencenbaugh	Telephone conference with client representatives regarding filings by opposing party on Motion to Compel; analyze filings by opposing party related to Motion for Leave in opposition to Motion to Compel and arguments regarding discovery on Motion to Compel; outline issues relevant to response to Motion for Leave in opposition to Motion to Compel.	2.7	\$725.00	\$ 1,957.50	C.4
1/24/2020	Adam H. Sencenbaugh	Continue draft of Response to Motion for Leave in opposition to Motion to Compel; email correspondence with client representatives regarding Response to Motion for Leave in opposition to Motion to Compel.	1.8	\$725.00	\$ 1,305.00	C.4
1/26/2020	Henson Adams	Begin draft of Declaration in Support of Response to Motion for Leave in opposition to Motion to Compel; review documents produced by Defendants in response to Motion to Compel; begin draft of Motion for Leave to file under seal.	2.5	\$495.00	\$ 1,237.50	C.4

1/27/2020	Adam H. Sencenbaugh	Email correspondence with opposing counsel regarding Motion for Leave in opposition to Motion to Compel; revise Response to Motion for Leave in opposition to Motion to Compel; email correspondence with opposing counsel regarding issues relevant to Motion for Leave.	4.2	\$725.00	\$ 3,045.00	C.4
1/28/2020	Adam H. Sencenbaugh	Revise and file Response to Motion for Leave in opposition to Motion to Compel; email correspondence with opposing counsel regarding issues relevant to Motion for Leave in opposition to Motion to Compel.	3.5	\$725.00	\$ 2,537.50	C.4
1/29/2020	Henson Adams	Review and analyze Defendants' Amended Response to Motion to Compel; research federal law regarding arguments Defendants make in the same; begin to draft Reply to Amended Response to Motion to Compel.	4.3	\$495.00	\$ 2,128.50	C.4
2/3/2020	Henson Adams	Draft Plaintiff's Reply to Defendants' Amended Response to Motion to Compel; review and analyze Amended Response to Motion to Compel with respect to the same; research federal law regarding issues relevant to Motion to Compel.	8.7	\$495.00	\$ 4,306.50	C.4
2/4/2020	Henson Adams	Draft and revise Plaintiff's Reply to Defendants' Amended Response to Motion to Compel; draft and revise Appendix in support of the same.	7.4	\$495.00	\$ 3,663.00	C.4
2/4/2020	Adam H. Sencenbaugh	Outline issues and revise arguments relevant to Reply to Amended Response to Motion to Compel.	1.9	\$725.00	\$ 1,377.50	C.4

2/5/2020	Henson Adams	Continue to draft and revise Reply to Defendants' Amended Response to Motion to Compel; draft motion for leave to exceed page limits with respect to the same; continue to draft and revise appendix in support of the Reply in support of Motion to Compel.	3.6	\$495.00	\$ 1,782.00	C.4
2/6/2020	Henson Adams	Review, revise, and finalize Reply to Defendants' Amended Response to Motion to Compel, Motion for Leave to Exceed Page Limits, and proposed order regarding the same.	1.9	\$495.00	\$ 940.50	C.4
2/6/2020	Adam H. Sencenbaugh	Revise Reply to Amended Response to Motion to Compel, including exhibits and argument in support of Reply to Amended Response to Motion to Compel.	4.5	\$725.00	\$ 3,262.50	C.4
Subtotal			48.3		\$ 28,186.50	

Motion to Compel: Responding to Motion for Leave to File Surreply						
DATE	TIME KEEPER	DESCRIPTION	TIME	RATE	FEE	ACTIVITY
1/2/2020	Henson Adams	Review and prepare correspondence with opposing counsel regarding Defendants request to file a Surreply to Motion to Compel.	1.2	\$495.00	\$ 594.00	C.5
2/14/2020	Henson Adams	Review and analyze Defendants' Motion for Leave to File Surreply in opposition to Motion to Compel and Defendants' Surreply to BalanceCXI Reply in opposition to Motion to Compel; discuss and strategize response.	1.8	\$495.00	\$ 891.00	C.5
2/14/2020	Adam H. Sencenbaugh	Telephone conference with client representatives regarding case status and outstanding discovery issues relevant to Motion to Compel.	0.9	\$725.00	\$ 652.50	C.5
2/15/2020	Henson Adams	Draft and revise response to Defendants' Motion for Leave to File Surreply in opposition to Motion to Compel; review and analyze case law cited in Defendants' Surreply in opposition to Motion to Compel; research federal law regarding electronic service issue relevant to Motion to Compel and Defendants' Surreply.	3.6	\$495.00	\$ 1,782.00	C.5
2/15/2020	Adam H. Sencenbaugh	Analyze Motion for Leave to File Surreply in opposition to Motion to Compel filed by Defendants; continue draft of Plaintiff's Response to Motion for Leave to File Surreply in opposition to Motion to Compel.	1.7	\$725.00	\$ 1,232.50	C.5

2/17/2020	Henson Adams	Revise Plaintiff's Response to Motion for Leave to File Surreply in opposition to Motion to Compel.	0.6	\$495.00	\$ 297.00	C.5
2/20/2020	Adam H. Sencenbaugh	Analyze legal issues relevant to Reply in Support of Motion for Leave to File Surreply in opposition to Motion to Compel; revise correspondence to opposing counsel regarding missing devices under discovery protocol and Motion to Compel.	1.4	\$725.00	\$ 1,015.00	C.5
2/21/2020	Henson Adams	Draft and revise letter to opposing counsel regarding Defendants' production of confidential information and additional devices identified relevant to Motion to Compel and device protocol.	1.5	\$495.00	\$ 742.50	C.5
Subtotal			12.7		\$ 7,206.50	

Motion to Compel: Additional Conference and Other Efforts Related to Motion to Compel						
DATE	TIME KEEPER	DESCRIPTION	TIME	RATE	FEE	ACTIVITY
12/18/2019	Adam H. Sencenbaugh	Email correspondence with opposing counsel regarding discovery issues relevant to case; telephone conference with client representatives regarding issues relevant to case; revise Rule 29 Device Protocol for use in case for production of hard drives and in support of Motion to Compel production of documents.	2.6	\$725.00	\$ 1,885.00	C.6
1/3/2020	Henson Adams	Review opposing counsel's request to the Court for a telephonic hearing regarding Motion to Compel, including strategies for handling the request; telephone conference with client regarding Motion to Compel; begin draft response to opposing counsel's email correspondence regarding Rule 29 Stipulation and device production in reference to Motion to Compel.	1.4	\$495.00	\$ 693.00	C.6
1/3/2020	Adam H. Sencenbaugh	Email correspondence with opposing counsel regarding case and production of missing hard drives sought in Motion to Compel; email correspondence with client representatives regarding case; telephone conference with client representatives regarding case status and Motion to Compel.	2	\$725.00	\$ 1,450.00	C.6

1/21/2020	Henson Adams	Telephone call with opposing counsel to confer on motion for leave relevant to Motion to Compel; review offer proposed by opposing counsel to resolve discovery dispute in Motion to Compel; discuss settlement offer on Motion to Compel with client and revise according to the same.	1.7	\$495.00	\$ 841.50	C.6
1/21/2020	Adam H. Sencenbaugh	Email correspondence and telephone conference with opposing counsel regarding issues relevant to case and Motion to Compel; analyze offer from opposing counsel related to discovery dispute on Motion to Compel.	2.3	\$725.00	\$ 1,667.50	C.6
2/3/2020	Adam H. Sencenbaugh	Telephone conference with opposing counsel regarding outstanding discovery due from Defendants and Motion to Compel; email correspondence with client representatives regarding case status and Motion to Compel.	1.5	\$725.00	\$ 1,087.50	C.6
2/26/2020	Henson Adams	Review Court order regarding hearing on Motion to Compel; discuss and strategize the same; correspondence with opposing counsel regarding conferencing over Motion to Compel issues.	2	\$495.00	\$ 990.00	C.6
2/27/2020	Adam H. Sencenbaugh	Email correspondence with opposing counsel regarding discovery issues relevant to Motion to Compel.	0.9	\$725.00	\$ 652.50	C.6
3/2/2020	Henson Adams	Create revised appendix to Motion to Compel in preparation for conference with opposing counsel.	0.8	\$495.00	\$ 396.00	C.6

3/2/2020	Adam H. Sencenbaugh	Revise and transmit correspondence to opposing party relevant to Motion to Compel.	2.2	\$725.00	\$ 1,595.00	C.6
3/3/2020	Adam H. Sencenbaugh	Prepare for and participate in conference with opposing party relevant to Motion to Compel.	1.6	\$725.00	\$ 1,160.00	C.6
Subtotal			19		\$ 12,418.00	

Motion to Compel: Preparing for and Attending Hearing on Motion to Compel						
DATE	TIME KEEPER	DESCRIPTION	TIME	RATE	FEE	ACTIVITY
3/3/2020	Henson Adams	Create presentation for hearing on Motion to Compel, review briefing on motion including related case law, and prepare for hearing on motion to compel. [REDUCE BY 3.0 HOURS]	2.1	\$495.00	\$ 1,039.50	C.7
3/4/2020	Henson Adams	Continue to work on Power Point presentation for hearing on Motion to Compel, including review of prior communications and creation of a timeline; continue to review briefing on motion including related case law and prepare for hearing on Motion to Compel; review discovery; finalize demonstrative appendix. [REDUCE BY 4.0 HOURS]	3.1	\$495.00	\$ 1,534.50	C.7
3/4/2020	Chrissy Long	Review and analyze federal rules and case law regarding the proper procedure for obtaining attorney's fees based on a Motion to Compel.	1.8	\$495.00	\$ 891.00	C.7

3/4/2020	Adam H. Sencenbaugh	Prepare materials for Motion to Compel hearing before United States Magistrate Judge; analyze discovery supplements provided by opposing party relevant to Motion to Compel and issues to be resolved in discovery dispute.	2.5	\$725.00	\$ 1,812.50	C.7
3/5/2020	Henson Adams	Prepare for and attend hearing on Motion to Compel.	4.5	\$495.00	\$ 2,227.50	C.7
3/5/2020	Adam H. Sencenbaugh	Prepare for and participate in hearing before United States Magistrate Judge on Motion to Compel.	3.8	\$725.00	\$ 2,755.00	C.7
Subtotal			17.8		\$ 10,260.00	

Motion to Compel: Responding to Emergency Motion to Amend Compel Order						
DATE	TIME KEEPER	DESCRIPTION	TIME	RATE	FEE	ACTIVITY
3/24/2020	Henson Adams	Revise response to Motion to Amend Court's order on Motion to Compel and prepare motion to amend text order; prepare exhibits to the same.	3.3	\$495.00	\$ 1,633.50	C.8
3/24/2020	Adam H. Sencenbaugh	Analyze Emergency Motion to Modify Judgment on Motion to Compel filed by Defendants; draft Response to Emergency Motion to Modify Judgment on Motion to Compel filed by Defendants.	3.7	\$725.00	\$ 2,682.50	C.8
3/25/2020	Henson Adams	Review and analyze briefing filed by Defendants regarding a deferment of modification of Court's order and opposing counsel's withdrawal from the case; review email correspondence from opposing counsel and help prepare responses to the same; prepare new redacted versions of interrogatory responses. [REDUCE BY 2.5 HOURS]	1	\$495.00	\$ 495.00	C.8
3/30/2020	Adam H. Sencenbaugh	Begin draft of Reply in Support of Motion to Modify/Amend Text Order relevant to Motion to Compel; email correspondence with client representatives regarding issues relevant to Motion to Compel.	2.2	\$725.00	\$ 1,595.00	C.8
3/31/2020	Adam H. Sencenbaugh	Complete draft of Reply in Support of Motion to Modify/Amend Text Order relevant to Motion to Compel; email correspondence with client representatives regarding issues relevant to Motion to Compel.	1.8	\$725.00	\$ 1,305.00	C.8

4/1/2020	Henson Adams	Review and revise Reply in Support of Motion to Amend text order on Motion to Compel and finalize the same for filing.	1.7	\$495.00	\$ 841.50	C.8
4/1/2020	Adam H. Sencenbaugh	Revise and file Reply in Support of Motion to Amend Text Order regarding Motion to Compel.	1.2	\$725.00	\$ 870.00	C.8
4/6/2020	Henson Adams	Review Court's order granting BalanceCXI's Motion for an amended text order on Motion to Compel and strategize next steps and upcoming tasks.	1.5	\$495.00	\$ 742.50	C.8
Subtotal			16.4		\$ 10,165.00	

Motion for Sanctions: Preparing Advisories and Related Conference Efforts						
DATE	TIME KEEPER	DESCRIPTION	TIME	RATE	FEE	ACTIVITY
3/13/2020	Adam H. Sencenbaugh	Analyze Court order regarding Motion to Compel and communicate with clients regarding order on Motion to Compel; email correspondence with opposing counsel regarding devices relevant to Motion to Compel.	1.4	\$725.00	\$ 1,015.00	S.1
3/19/2020	Henson Adams	Review declaration of Kerry O'Brien relevant to Motion to Compel.	0.4	\$495.00	\$ 198.00	S.1
3/20/2020	Adam H. Sencenbaugh	Analyze documents produced by opposing counsel in response to Motion to Compel; email correspondence with opposing counsel regarding outstanding discovery relevant to Motion to Compel.	1.5	\$725.00	\$ 1,087.50	S.1
3/25/2020	Adam H. Sencenbaugh	Email correspondence with opposing counsel regarding discovery relevant to case; email correspondence with client representatives regarding issues relevant to Motion to Compel.	1.1	\$725.00	\$ 797.50	S.1
3/27/2020	Henson Adams	Review documents and discovery produced by Defendants; communication with opposing counsel regarding the same.	1.5	\$495.00	\$ 742.50	S.1
3/27/2020	Adam H. Sencenbaugh	Email correspondence with opposing party regarding outstanding discovery issues; analyze revised interrogatory responses from Defendants served in response to Motion to Compel.	1.5	\$725.00	\$ 1,087.50	S.1
3/28/2020	Henson Adams	Review correspondence from opposing counsel and new interrogatory and request for production responses. [REDUCE BY 1.0 HOURS]	0.5	\$495.00	\$ 247.50	S.1

3/30/2020	Henson Adams	Coordinate document load and discuss metadata findings with the litigation support team; review and analyze documents produced by Defendants in response to Motion to Compel.	1.7	\$495.00	\$ 841.50	S.1
3/31/2020	Henson Adams	Continue to review produced documents; review litigation support team spreadsheet regarding slip sheets in Defendants' production; review and revise Reply in Support of Motion to Modify/Amend Text Order.	2.2	\$495.00	\$ 1,089.00	S.1
4/3/2020	Henson Adams	Review and analyze Discovery Advisory filed by Defendants regarding Motion to Compel; outline arguments for Initial Discovery Advisory regarding Motion to Compel on behalf of BalanceCXI.	1.6	\$495.00	\$ 792.00	S.1
4/3/2020	Adam H. Sencenbaugh	Analyze Discovery Advisory regarding Motion to Compel filed by opposing party; revise and file response to Discovery Advisory regarding Motion to Compel filed by opposing party.	1.9	\$725.00	\$ 1,377.50	S.1
4/7/2020	Henson Adams	Team phone call with co-counsel to discuss discovery strategy. [NO CHARGE]	[0.7]	N/A	No Charge	S.1
4/7/2020	Iris Gibson	Analyze issues relevant to discovery and disclosure of source code.	0.5	\$700.00	\$ 350.00	S.1
4/7/2020	Adam H. Sencenbaugh	Telephone conference with opposing counsel regarding case issues; begin draft of Plaintiff's Advisory to Court regarding discovery compliance by Defendants on Motion to Compel.	1.9	\$725.00	\$ 1,377.50	S.1
4/8/2020	Henson Adams	Continue to review documents produced by Defendants.	2.5	\$495.00	\$ 1,237.50	S.1

4/9/2020	Henson Adams	Continue to review documents produced by Defendants.	1.5	\$495.00	\$ 742.50	S.1
4/9/2020	Adam H. Sencenbaugh	Continue draft of Plaintiff's Advisory to Court regarding Defendants' compliance with Motion to Compel.	3.6	\$725.00	\$ 2,610.00	S.1
4/10/2020	Adam H. Sencenbaugh	Analyze documents produced by Defendants in response to Motion to Compel; continue draft of Plaintiff's Advisory to Court regarding Defendants' compliance with Court's order on Motion to Compel.	3.3	\$725.00	\$ 2,392.50	S.1
4/13/2020	Henson Adams	Review revised scheduling order; continue to review documents produced by Defendants.	3.7	\$495.00	\$ 1,831.50	S.1
4/13/2020	Adam H. Sencenbaugh	Continue draft of Plaintiff's Advisory to Court regarding Defendants' compliance with Court's order on Motion to Compel.	3.3	\$725.00	\$ 2,392.50	S.1
4/14/2020	Henson Adams	Telephone conference with forensic examiner to discuss forensic findings and review of discovery responses and Defendants' Discovery Advisory; continue to review documents and communications produced by Defendants in response to Motion to Compel. [REDUCED BY 3.0 HOURS]	5.4	\$495.00	\$ 2,673.00	S.1

4/15/2020	Henson Adams	Review and analyze forensic issues and underlying documents relevant to Motion to Compel; telephone conference with clients to discuss source code and other issues related to Plaintiff's Discovery Advisory on Defendants' compliance with Motion to Compel; discuss missing metadata issue with internal technical specialists and analysis of the same; continue to review documents for gathering and use as exhibits to Plaintiff's Advisory; telephone call with forensic examiner. [REDUCED BY 3.0 HOURS]	6	\$495.00	\$ 2,970.00	S.1
4/15/2020	Adam H. Sencenbaugh	Telephone conference with client representatives regarding forensic issues relevant to case; continue draft of Advisory to Court regarding Defendants' compliance with Court's Order on Motion to Compel.	3.4	\$725.00	\$ 2,465.00	S.1
4/16/2020	Henson Adams	Continue to draft and revise Plaintiff's Discovery Advisory on Defendants' compliance with Motion to Compel; draft and revise declaration of Timothy Barnes for use with Plaintiff's Advisory; telephone call with clients regarding the same; gather, review, and prepare exhibits to Plaintiff's Advisory; review Defendants' Advisory and discovery responses and continue to add content to Plaintiff's Advisory related to the same.	6	\$495.00	\$ 2,970.00	S.1

4/16/2020	Adam H. Sencenbaugh	Telephone conference with client representative regarding declaration in support of Plaintiff's Advisory on Defendants' compliance with Court's order on Motion to Compel; revise declaration in support of Plaintiff's Advisory on Motion to Compel; continue draft of Plaintiff's Advisory on Defendants' compliance with the Court's order on Motion to Compel.	2.9	\$725.00	\$ 2,102.50	S.1
4/17/2020	Henson Adams	Draft, revise, and finalize Plaintiff's Advisory regarding Defendants' compliance with Court's order on Motion to Compel; gather and finalize exhibits related to the same; telephone call with forensic examiner to discuss forensic issues relevant to case; draft and revise Motion to Seal related to confidential exhibits attached to Plaintiff's Advisory and proposed order. [REDUCED BY 3.0 HOURS]	2.3	\$495.00	\$ 1,138.50	S.1
4/17/2020	Adam H. Sencenbaugh	Telephone conference with forensic expert regarding issues relevant to missing devices ordered produced pursuant to Motion to Compel; revise and file Plaintiff's Advisory to Court regarding Defendants' compliance with Court's order on Motion to Compel.	3.8	\$725.00	\$ 2,755.00	S.1
Subtotal			65.4		\$ 39,283.50	

Motion for Sanctions: Preparing Motion for Sanctions						
DATE	TIME KEEPER	DESCRIPTION	TIME	RATE	FEE	ACTIVITY
2/5/2020	Chrissy Long	Review and analyze Federal Rule of Civil Procedure 37(e) regarding spoliation of electronically stored information, 2015 amendments, and case law interpreting same, and compile findings into spoliation memo.	3	\$495.00	\$ 1,485.00	S.2
2/6/2020	Chrissy Long	Review and analyze federal case law regarding duty of preservation and the standard for reasonable steps at preservation and revise spoliation memo regarding same.	3.3	\$495.00	\$ 1,633.50	S.2
2/7/2020	Chrissy Long	Review and analyze federal case law regarding culpability standards for spoliation and corresponding sanctions, and revise spoliation memo regarding same.[REDUCED BY 3.0HOURS]	1.8	\$495.00	\$ 891.00	S.2
2/10/2020	Chrissy Long	Review and analyze relevant law regarding a plaintiff's spoliation and revise spoliation memo regarding same.	1.8	\$495.00	\$ 891.00	S.2
2/11/2020	Chrissy Long	Review and analyze case law regarding culpability standards for spoliation and available remedies, and revise spoliation memo regarding same.	5.3	\$495.00	\$ 2,623.50	S.2

4/20/2020	Henson Adams	Review Court's order that BalanceCXI file a Motion for Sanctions for Defendants' failure to comply with Court's order on Motion to Compel; analyze federal law regarding Rule 37(b) sanctions for failure to comply with a court's discovery order.	2.6	\$495.00	\$ 1,287.00	S.2
4/20/2020	Adam H. Sencenbaugh	Analyze Order from United States District Court regarding Plaintiff's Advisory on Defendants' compliance with Court's order on Motion to Compel; outline issues relevant to Motion for Sanctions.	1.7	\$725.00	\$ 1,232.50	S.2
4/21/2020	Henson Adams	Research federal law regarding Rule 37(b) sanctions.	2	\$495.00	\$ 990.00	S.2
4/21/2020	Iris Gibson	Conference with co-counsel regarding Motion for Sanctions under Federal Rule 37(b); outline arguments for Motion for Rule 37(b) Discovery Sanctions; research and provide summary of discovery sanctions available under Federal Rule 37(b).	6.4	\$700.00	\$ 4,480.00	S.2
4/21/2020	Adam H. Sencenbaugh	Analyze issues relevant to Motion for Discovery Sanctions against Defendants; revise Motion for Discovery Sanctions against Defendants.	2.8	\$725.00	\$ 2,030.00	S.2

4/22/2020	Henson Adams	Telephone call with co-counsel to discuss the Motion for Rule 37(b) Discovery Sanctions; research federal law related to Rule 37(b) discovery sanctions; telephone call with client regarding Motion for Rule 37(b) Discovery Sanctions; draft, revise, and finalize Motion for Rule 37(b) Discovery Sanctions. [REDUCED BY 4.0 HOURS]	5.2	\$495.00	\$ 2,574.00	S.2
4/22/2020	Iris Gibson	Conference with co-counsel regarding Motion for Rule 37(b) Discovery Sanctions; research standard for adverse instructions for spoliation as discovery sanction; revise draft of Motion for Rule 37(b) Discovery Sanctions. [REDUCED BY 1.5 HOURS]	2.6	\$700.00	\$ 1,820.00	S.2
4/22/2020	Adam H. Sencenbaugh	Revise and file Motion for Rule 37(b) Discovery Sanctions against Defendants; email correspondence and telephone conference with client representatives regarding Motion for Rule 37(b) Discovery Sanctions.	6.5	\$725.00	\$ 4,712.50	S.2
Subtotal			45	\$ 26,650.00		

Motion for Sanctions: Conference and Other Efforts Related to Motion for Sanctions						
DATE	TIME KEEPER	DESCRIPTION	TIME	RATE	FEE	ACTIVITY
4/7/2020	Henson Adams	Telephone call with new opposing counsel in case; discuss next steps regarding case strategy. [NO CHARGE]	[0.7]	N/A	No Charge	S.3
4/23/2020	Adam H. Sencenbaugh	Email correspondence and telephone conference with opposing party regarding issues relevant to Motion for Rule 37(b) Discovery Sanctions.	1.3	\$725.00	\$ 942.50	S.3
4/24/2020	Adam H. Sencenbaugh	Analyze issues relevant to Motion for Rule 37(b) Discovery Sanctions reply brief; email correspondence with opposing party regarding discovery offer and response to Motion for Rule 37(b) Discovery Sanctions.	1.9	\$725.00	\$ 1,377.50	S.3
4/25/2020	Henson Adams	Review documents produced by Defendants for missing metadata; discuss the same and correspondence with opposing counsel regarding missing metadata.	1.3	\$495.00	\$ 643.50	S.3

4/27/2020	Adam H. Sencenbaugh	Analyze documents for production in case; email correspondence with opposing party regarding Motion for Rule 37(b) Discovery Sanctions and issues relevant to Motion to Compel.	2.3	\$725.00	\$ 1,667.50	S.3
4/28/2020	Henson Adams	Telephone call with co-counsel to discuss response to opposing counsel's correspondence. [NO CHARGE]	[0.3]	N/A	No Charge	S.3
Subtotal			6.8		\$ 4,631.00	

Motion for Sanctions: Replying to Response to Motion for Sanctions						
DATE	TIME KEEPER	DESCRIPTION	TIME	RATE	FEE	ACTIVITY
4/29/2020	Henson Adams	Review and analyze Defendants' Response to BalanceCXI Motion for Rule 37(b) Sanctions and exhibits to the same; review case law related to issues raised in Response.	3.4	\$495.00	\$ 1,683.00	S.4
4/29/2020	Iris Gibson	Review Response to Motion for Sanctions and attachments thereto; begin outline of arguments for Reply. [NO CHARGE]	[0.8]	N/A	No Charge	S.4
4/29/2020	Adam H. Sencenbaugh	Analyze Response in Opposition to Motion for Sanctions under Rule 37(b); begin draft of Reply in Support of Motion for Rule 37(b) Discovery Sanctions.	3.8	\$725.00	\$ 2,755.00	S.4
4/30/2020	Henson Adams	Review draft discovery requests; telephone call with clients to discuss the same and the reply to Defendants' Response to BalanceCXI's Motion for Rule 37(b) Discovery Sanctions; review Defendants' Response and outline arguments for reply in support of BalanceCXI's Motion for Rule 37(b) Discovery Sanctions. [REDUCED BY 3.5 HOURS]	3.8	\$495.00	\$ 1,881.00	S.4
4/30/2020	Adam H. Sencenbaugh	Telephone conference with client representatives regarding Motion for Rule 37(b) Discovery Sanctions; continue revisions to Reply in Support of Motion for Rule 37(b) Discovery Sanctions.	2.6	\$725.00	\$ 1,885.00	S.4

5/1/2020	Henson Adams	Continue to review and analyze Defendants' Response to Motion for Rule 37 Sanctions for failure to follow Court's order on Motion to Compel; draft and revise Reply to the same; review related evidence for use in Reply in support of Motion for Sanctions.	4.6	\$495.00	\$2,277.00	S.4
5/1/2020	Adam H. Sencenbaugh	Revise Reply in Support of Motion for Rule 37 Sanctions related to Motion to Compel	2.4	\$725.00	\$ 1,740.00	S.4
5/2/2020	Henson Adams	Discuss Reply in Support of Motion for Sanctions with co-counsel	[0.5]	N/A	No Charge	S.4
5/3/2020	Henson Adams	Begin draft of Reply in Support of Motion for Rule 37 Sanctions for Defendants' failure to follow Court's order on Motion to Compel; review and gather evidence related to the same.	2	\$495.00	\$ 990.00	S.4
5/4/2020	Henson Adams	Revise Reply in Support of Motion for Rule 37 Sanctions for Defendants' failure to follow Court's order on Motion to Compel; continue to review and analyze documents and other evidence related to the same.	4.5	\$495.00	\$ 2,227.50	S.4
5/4/2020	Iris Gibson	Review draft Reply to Response to Motion for Rule 37 Sanctions and provide comments to same.	[0.3]	N/A	No Charge	S.4
5/4/2020	Adam H. Sencenbaugh	Revise Reply in Support of Rule 37 Sanctions related to Defendants' failure to follow Court's ruling on Motion to Compel; analyze evidence in support of request for Rule 37 Sanctions.	4.2	\$725.00	\$ 3,045.00	S.4

5/5/2020	Henson Adams	Revise Reply in Support of Rule 37 Sanctions related to Defendants' failure to follow Court's ruling on Motion to Compel and exhibits to the same. [REDUCED BY 2.0 HOURS]	1.6	\$495.00	\$ 792.00	S.4
5/5/2020	Henson Adams	Discuss case strategy and response to opposing counsel with co-counsel.	[0.8]	N/A	No Charge	S.4
5/5/2020	Adam H. Sencenbaugh	Revise and file Reply in Support of Rule 37 Sanctions related to Defendants' failure to follow Court's ruling on Motion to Compel; email correspondence with opposing counsel regarding discovery issues relevant to case.	3.8	\$725.00	\$ 2,755.00	S.4
Subtotal			36.7		\$ 22,030.50	

Motion for Sanctions: Preparing for and Attending Evidentiary Hearing on Motion for Sanctions						
DATE	TIME KEEPER	DESCRIPTION	TIME	RATE	FEE	ACTIVITY
5/18/2020	Iris Gibson	Review issues relevant to attorney-client privilege in context of claims of spoliation and summarize potential waiver arguments relating to privilege.	0.7	\$700.00	\$ 490.00	S.5
5/18/2020	Iris Gibson	Conference regarding Order setting hearing on Motion for Sanctions and discuss strategy regarding depositions and preparation for hearing; review burden of proof for sanctions under Rule 37 and prepare summary of elements based on different relief sought.	1.1	\$700.00	\$ 770.00	S.5
5/20/2020	Henson Adams	Continue to review documents produced by Defendants; preparation and research for virtual depositions and hearings; draft and revise notices of depositions for Defendant Adam Oldfield and Defendant Chris DeSimone.	5.3	\$495.00	\$ 2,623.50	S.5
5/21/2020	Henson Adams	Continue to review document productions and gather evidence for depositions and hearings; telephone call with forensic examiner to discuss collection of imaged devices files; telephone call with client and witness to discuss potential testimony at June 3 hearing; begin creating hearing demonstratives.	4.1	\$495.00	\$ 2,029.50	S.5

5/22/2020	Henson Adams	Continue to review produced documents and use the same to create deposition and hearing exhibits; review letter from opposing counsel regarding document production and metadata; telephone conference with opposing counsel regarding document production, deposition logistics, and hearing logistics; revise and finalize deposition notices for Defendant Adam Oldfield and Defendant Chris DeSimone.	6.5	\$495.00	\$ 3,217.50	S.5
5/24/2020	Henson Adams	Continue to gather exhibits and evidence with respect to depositions and hearing. [REDUCED BY 2.0 HOURS]	4.8	\$495.00	\$ 2,376.00	S.5
5/25/2020	Henson Adams	Continue to review and analyze documents in preparation for hearing and deposition of Defendants. [REDUCED BY 3.0 HOURS]	5.8	\$495.00	\$ 2,871.00	S.5
5/27/2020	Henson Adams	Continue to review evidence and prepare exhibits for depositions and hearing; coordinate virtual depositions with Veritext; telephone calls with clients to discuss depositions and email received from Mr. Alvandi and production of declarations by Defendants; telephone call with forensic expert to discuss hearing and prepare for the same.	7.8	\$495.00	\$ 3,861.00	S.5
5/28/2020	Henson Adams	Prepare for and attend deposition of Defendant Adam Oldfield; strategize and begin preparation for Defendant Christopher DeSimone's deposition and direct examination of Roy Rector. [REDUCED BY 9.0 HOURS].	3.4	\$495.00	\$ 1,683.00	S.5

5/28/2020	Iris Gibson	Research no-contact ethics rule under American Bar Association Model Rule and Texas Disciplinary Rule; consider what BalanceCXI employees are covered under no-contact rules; determine appropriate remedies for violation of no-contact rule; prepare summary of research for use in upcoming hearing.	4.2	\$700.00	\$ 2,940.00	S.5
5/30/2020	Henson Adams	Continue to review exhibits and prepare deposition outline for Defendant Chris DeSimone; review documents related to Mr. DeSimone; prepare for hearing; draft letter related to metadata and issue regarding Defendants contacting current BalanceCXI employees. [REDUCED BY 3.0 HOURS]	9.7	\$495.00	\$ 4,801.50	S.5
5/30/2020	Iris Gibson	Review deposition transcript of Defendant Adam Oldfield; designate, categorize, and summarize potential impeachment testimony for use in hearing.	2.2	\$700.00	\$ 1,540.00	S.5
5/31/2020	Henson Adams	Continue to prepare outline and exhibits for deposition of Chris DeSimone and documents related to the same; work on hearing presentation; work on direct of Roy Rector; review deposition designations and deposition transcript of Defendant Adam Oldfield; continue to prepare for hearing. [REDUCED BY 3.0 HOURS]	9.5	\$495.00	\$ 4,702.50	S.5

5/31/2020	Iris Gibson	Continue review of deposition transcript of Defendant Adam Oldfield and exhibits thereto; designate, categorize, and summarize potential impeachment testimony; prepare chart of designations for use in hearing in case.	4.5	\$700.00	\$ 3,150.00	S.5
5/31/2020	Chrissy Long	Review federal cases regarding spoliation for use in hearing under Federal Rule of Civil Procedure 37.	0.9	\$495.00	\$ 445.50	S.5
5/31/2020	Adam H. Sencenbaugh	Prepare for deposition of Defendant Chris DeSimone, including preparation of outline and deposition exhibits; prepare materials for hearing on Motion for Discovery Sanctions for Defendants' failure to follow ruling on Motion to Compel.	4.8	\$725.00	\$ 3,480.00	S.5
6/1/2020	Henson Adams	Prepare for and attend the deposition of Defendant Christopher DeSimone; continue to prepare for hearing on Motion for Discovery Sanctions for Defendants' failure to follow ruling on Motion to Compel, including gathering and designating exhibits and creating demonstratives; prepare direct examination of Plaintiff expert witness Roy Rector. [REDUCED BY 9.0 HOURS]	5.3	\$495.00	\$ 2,623.50	S.5

6/1/2020	Iris Gibson	Continue preparing exhibits and deposition designations for cross examination of Defendant Adam Oldfield; review and revise Defendant Adam Oldfield cross examination; prepare talking points for hearing relating to Motion for Discovery Sanctions for Defendants' failure to follow ruling on Motion to Compel; review and incorporate arguments relating to death penalty sanctions under Rule 37 (b)(2) and (e). [REDUCED BY 2.0 HOURS]	6.3	\$700.00	\$ 4,410.00	S.5
6/2/2020	Henson Adams	Continue to prepare for hearing on Motion for Discovery Sanctions for Defendants' failure to follow ruling on Motion to Compel; witness preparation session with expert witness Roy Rector; review and analyze depositions of Defendant Adam Oldfield and Defendant Chris DeSimone and video clips of Defendant Adam Oldfield's deposition; review and prepare direct examination of expert witness; review legal issues related to hearing; prepare PowerPoint demonstrative for hearing. [REDUCED BY 5.0 HOURS]	12.5	\$495.00	\$ 6,187.50	S.5
6/2/2020	Michael Brockwell	Create video deposition database for hearing; create excerpts of video depositions to include in Motion for Discovery Sanctions for Defendants' failure to follow ruling on Motion to Compel; graphic design of presentation.	5.5	\$350.00	\$ 1,925.00	S.5

		<p>Prepare presentation slides for legal arguments in Motion for Discovery Sanctions for Defendants' failure to follow ruling on Motion to Compel;</p> <p>prepare talking points for hearing on Motion for Discovery Sanctions for Defendants' failure to follow ruling on Motion to Compel relating to legal arguments and the admissibility of current employees statements obtained in breach of the no-contact ethical rules; review and edit DeSimone cross examination deposition excerpts; research and draft arguments regarding the application of the Federal Rules of Evidence to sanctions hearings; review and prepare legal arguments for spoliation sanctions under Rule 37(e).</p> <p>[REDUCED BY 4.0 HOURS].</p>				
6/2/2020	Iris Gibson		8.4	\$700.00	\$ 5,880.00	S.5
		<p>Draft talking points for evidentiary hearing regarding Defendants' failure to comply with Federal Rule of Civil Procedure 31 in obtaining Stephen Reed's and Trevor Barton's declarations. [NO CHARGE]</p>				
6/2/2020	Chrissy Long		[0.9]	N/A	No Charge	S.5

6/2/2020	Adam H. Sencenbaugh	Analyze legal issues relevant to hearing on Motion for Discovery Sanctions for Defendants' failure to follow ruling on Motion to Compel; prepare exhibits and opening statement for use in Motion for Discovery Sanctions for Defendants' failure to follow ruling on Motion to Compel; revise cross examination outlines for use in Motion for Discovery Sanctions for Defendants' failure to follow ruling on Motion to Compel.	11.2	\$725.00	\$ 8,120.00	S.5
6/3/2020	Henson Adams	Prepare for and attend evidentiary hearing on BalanceCXI's Motion for Discovery Sanctions for Defendants' failure to follow ruling on Motion to Compel; telephone calls with client related to the same. [REDUCED BY 3.0 HOURS]	10.3	\$495.00	\$ 5,098.50	S.5
6/3/2020	Iris Gibson	Prepare talking points for waiver of attorney-client privilege; research and summarize relevant privilege issues.	1.2	\$700.00	\$ 840.00	S.5
6/3/2020	Adam H. Sencenbaugh	Prepare for and participate in hearing on Motion for Discovery Sanctions for Defendants' failure to follow ruling on Motion to Compel.	11.8	\$725.00	\$ 8,555.00	S.5
6/4/2020	Henson Adams	Continue to prepare for and attend second day of evidentiary hearing on BalanceCXI's Motion for Discovery Sanctions for Defendants' failure to follow ruling on Motion to Compel; telephone calls with client related to the same.	11	\$495.00	\$ 5,445.00	S.5

6/4/2020	Adam H. Sencenbaugh	Prepare for and participate in hearing on Motion for Discovery Sanctions for Defendants' failure to follow ruling on Motion to Compel.	10.7	\$725.00	\$ 7,757.50	S.5
Subtotal			169.5		\$ 97,823.00	

Forensic Work: Forensic Related Attorney Work						
DATE	TIME KEEPER	DESCRIPTION	TIME	RATE	FEE	ACTIVITY
1/8/2020	Adam H. Sencenbaugh	Telephone conference with client representatives regarding case status and Motion to Compel; telephone conference with forensic examiner regarding missing devices relevant to Motion to Compel; prepare outline for hearing before United States Magistrate Judge in case on issues relevant to Motion to Compel; analyze documents provided by forensic examiner relevant to hard drives sought in Motion to Compel.	3.7	\$725.00	\$ 2,682.50	F.1
1/9/2020	Henson Adams	Review and analyze forensic report regarding the list of devices connected to the Lexar and Western Digital devices sought in Motion to Compel; review list of files recovered from the Lexar and Western Digital devices sought in Motion to Compel; discuss the same with client; prepare for and attend telephonic hearing before the Court. [REDUCED BY 3.0 HOURS]	1.7	\$495.00	\$ 841.50	F.1
1/9/2020	Adam H. Sencenbaugh	Prepare for and participate in status conference with United States Magistrate Judge regarding case and Motion to Compel; telephone conference with client representative regarding case and Motion to Compel; analyze reports provided by forensic examiner relevant to Motion to Compel.	2.9	\$725.00	\$ 2,102.50	F.1

2/11/2020	Henson Adams	Telephone call with witness regarding forensic analysis of electronic devices.	1	\$495.00	\$ 495.00	F.1
2/11/2020	Adam H. Sencenbaugh	Analyze issues relevant to expert witness for use in case; telephone conference with expert witness to discuss issues relevant to case.	2.3	\$725.00	\$ 1,667.50	F.1
Subtotal			11.6		\$ 7,789.00	

Forensic Costs: R3 Digital Forensics Invoices				
DATE	ACTIVITY	QTY	RATE	AMOUNT
06/07/2019	Forensic Image Archiving Fee for forensic file storage media.	1	\$ 250.00	\$ 250.00
06/07/2019	Services-250 Adam computer: Intake, forensic imaging and documentation - Tyler B. Rector	0.8	\$ 250.00	\$ 200.00
06/07/2019	Services-325 Conference call, Adam computer: initial data assessment - Roy D. Rector	0.5	\$ 325.00	\$ 162.50
06/12/2019	Services-325 Adam Laptop: 06/10-12/19 Forensic analysis, report and exhibit drafting - Roy D. Rector	7.2	\$ 325.00	\$ 2,340.00
06/13/2019	Services-325 Adam Laptop: Report and exhibit drafting, review & finalization - Roy D. Rector	1.8	\$ 325.00	\$ 585.00
06/17/2019	Services-325 Chris Laptop: 06/13-17/19 Forensic analysis, report and exhibit drafting - Roy D. Rector	4.9	\$ 325.00	\$ 1,592.50
06/18/2019	Services-325 Chris Laptop: report and exhibit drafting, review & finalization - Roy D. Rector	1	\$ 325.00	\$ 325.00
09/03/2019	Services-325 Case review and conference call. - Roy D. Rector	1	\$ 325.00	\$ 325.00
09/25/2019	Services-325 Conference call with Henson Adams - Roy D. Rector	0.4	\$ 325.00	\$ 130.00
09/26/2019	Services-325 Henson Adams led group conference call - Roy D. Rector	0.9	\$ 325.00	\$ 292.50
12/21/2019	Services-275 Intake, imaging and documentation - Tyler B. Rector	1.1	\$ 275.00	\$ 302.50
01/08/2020	Services-275 USB devices, active file identification and file list creation - Tyler B. Rector	1.3	\$ 275.00	\$ 357.50

01/08/2020	Services-325 1/08-13/2020: Conference call, USB forensic examinations, computer connections report, attention to email to Heston - Roy D. Rector	6.8	\$ 325.00	\$ 2,210.00
02/11/2020	Services-325 Conference call with Heston & Adam - Roy D. Rector	1.1	\$ 325.00	\$ 357.50
02/24/2020	Services-325 2/24-27/2020: Laptop and USB devices - forensic examination, report and exhibits drafting - Roy D. Rector	9.4	\$ 325.00	\$ 3,055.00
03/03/2020	Services-325 2/29-3/3: Analysis, report and exhibit drafting - Roy D. Rector	9	\$ 325.00	\$ 2,925.00
03/04/2020	Services-325 Conference call with Heston and Adam - Roy D. Rector	1.4	\$ 325.00	\$ 455.00
03/11/2020	Services-325 Conference & TeamViewer session with Heston and Adam - Roy D. Rector	1.6	\$ 325.00	\$ 520.00
04/14/2020	Services-325 Defendant response documents review, conference call with Henson and Adam. - Roy D. Rector	2.5	\$ 325.00	\$ 812.50
04/17/2020	Services-325 WebEx conference with Henson and Adam - Roy D. Rector	1.2	\$ 325.00	\$ 390.00
05/18/2020	Services-325 Conference with Henson - Roy D. Rector	0.2	\$ 325.00	\$ 65.00
05/20/2020	Services-325 Conference with Henson regarding files to export - Roy D. Rector	0.2	\$ 325.00	\$ 65.00
05/21/2020	Services-325 Data export, FTP upload config - Henson request - Roy D. Rector	0.6	\$ 325.00	\$ 195.00
05/27/2020	Services-325 Conference call with Henson - discussion regarding hearing - Roy D. Rector	0.7	\$ 325.00	\$ 227.50

6/1/2020	Services-325 Oilfield deposition review - Roy D. Rector	1	\$ 325.00	\$ 325.00
6/2/2020	Services-325 Conference call with Adam and Henson, courtroom testimony review - Roy D. Rector	4.5	\$ 325.00	\$ 1,462.50
6/3/2020	Services-325 Conference call with Henson - Roy D. Rector	0.6	\$ 325.00	\$ 195.00
6/3/2020	Services-325 Hearing prep and hearing - Roy D. Rector	5.5	\$ 325.00	\$ 1,787.50
6/3/2020	Services-325 Zoom Court - Roy D. Rector	4.7	\$ 325.00	\$ 1,527.50
12/02/2020	Services-275 File identification and deletion from defendant's devices (Requested by Hanson) - Tyler B. Rector	1	\$ 275.00	\$ 275.00
12/04/2020	Services-325 Additional files for deletion from defendant's devices (Requested by Hanson). Device free space wiping. - Roy D. Rector	0.3	\$ 325.00	\$ 97.50
Subtotal		74	\$ 23,810.00	